

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LOUIS NAIMAN, individually and on
behalf of all others similarly situated,

CASE NO. 2:19-cv-01643-JAD-DJY

Plaintiff,

V.

BLUE RAVEN SOLAR, LLC and
RENOVATION REFERRAL LLC and
GABRIEL ALAN SOLOMON,

Defendants

DECLARATION OF GABRIEL SOLOMON

1. I am over the age of eighteen years and am competent to make this declaration.

2. I have personal knowledge of the matters set forth in this declaration, except as to

those matters stated upon information and belief, and I believe those matters to be true.

3. Based on the foregoing, if called upon as a witness, I could and would competently testify as to all of the matters stated herein.

4. I am owner of Defendant RENOVATION REFERRAL LLC ("Renovation").

Renovation is based in Florida. Renovation has no office in Nevada.

5. Calls to consumers that are facilitated by Renovation are not limited to Nevada, but are made across the United States.

1 6. I am a resident of Coconut Creek, FL.

2 7. I do not own any property in Nevada, and I do not have an office in Nevada.

3 8. I have never individually held any business license issued by the state of Nevada.

4 9. I have never individually initiated a telephone solicitation to a wireless telephone
5 subscriber or regular user on behalf of Renovation.

6 10. I have never individually initiated telephone calls by using an automatic telephone
7 dialing system or prerecorded voice to any telephone number assigned to a cellular telephone
8 service on behalf of Renovation.

9 11. Renovation maintains a TCPA compliance policy. This includes scrubbing of
10 phone numbers to avoid calling numbers on the Federal Do Not Call list.

11 12. This TCPA compliance policy also includes obtaining “opt-in” consumer data that
12 Renovation believes establishes consent to call consumers.

13 13. I am informed that Plaintiff claims Renovation called him at (707) 832-xxxx on
14 April 8, 2019.

15 14. Renovation’s TCPA policy was in force at the time of the alleged call to Plaintiff.

16 15. I do not personally oversee the day to day calling operations of Renovation.

17 16. I do not personally load lists of numbers to be called and initiate calls to be made.

18 17. I did not specifically direct Renovation to call Plaintiff at the (707) 832-xxxx
19 number via an automated telephone dialing system or artificial or prerecorded voice.

20 I declare under penalty of perjury that the foregoing is true and correct.

21 Executed this 15th day of September 2020, at Coconut Creek, FL.

22 
23 Gabriel Solomon